

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

WORLDVENTURS)
HOLDINGS, LLC,)
WORLDVENTURES)
MARKETING, LLC,)
WORLDVENTURES)
MARKETING LIMITED,)
WORLDVENTURES CANADA)
INC., WORLDVENTURES)
MARKETING B.V.,)
WORLDVENTURES)
MARKETING (HONG KONG))
LIMITED,)
WORLDVENTURES)
MARKETING PTE. LTD.,)
WORLDVENTURES TAIWAN)
LTD., WORLDVENTURES)
MARKETING PTY. LTD.,)
WORLDVENTURES)
MARKETING JAMAICA)
LIMITED,)
WORLDVENTURES)
SERVICES, LLC,)
WORLDVENTURES)
COOPERATIEF U.A.,)
WORLDVENTURES)
MARKETING SP.ZO.O,)
WORLDVENTURES)
MARKETING SOUTH)
AFRICA (PTY.)LTD,)
WORLDVENTURES)
ENTERPRISES LLC, WV)
SERVICES MALAYSIA SDN)
BHD, WORLDVENTURES)
MARKETING SRL,)
WORLDVENTURES)

JURY TRIAL DEMANDED

CIVIL ACTION NO.

4:18-cv-00393

JURY TRIAL DEMANDED

**EMERGENCY
APPLICATION FOR EX
PARTE TEMPORARY
RESTRAINING ORDER**

MARKETING (CYPRUS))
LIMITED,)
WORLDVENTURES)
MARKETING D.O.O.)
BEOGRAD,)
WORLDVENTURES)
MARKETING SL, D.O.O.,)
AND WORLDVENTURES)
MARKETING LIMITED)
WORLDVENTURES)
MARKETPLACE, LLC)
WORLDVENTURES)
HOLDINGS (NETHERLANDS))
B.V.)
WORLDVENTURES)
MARKETING LIMITED (NEW)
ZEALAND))
WORLDVENTURES)
MARKETING COLOMBIA)
S.A.S)
WORLDVENTURES)
HOLDINGS ASIA PTE. LTD.)
)
Plaintiffs,)
)
v.)
)
MAVIE, ARIIX, LLC)
ARIIX HOLDINGS, LLC,)
ARIIX INTERNATIONAL,)
INC.)
ADVANCED WELLNESS)
SOLUTIONS PTE LTD.)
ABBOUD BARAKAT)
individually,)
JONATHAN MCKILLIP,)
individually,)
KYLE LOWE, individually,)
ANTHONY FITZGERALD,)

individually,
MICHELLE SIDDY,
individually, KEMBLE
MORGAN, individually,
and
DANIEL AUDET, individually,

Defendants.

**CERTIFICATION OF COUNSEL IN SUPPORT OF EMERGENCY
APPLICATION FOR EX PARTE TEMPORARY RESTRAINING
ORDER AND BRIEF IN SUPPORT**

TO THE HONORABLE COURT:

WORLDVENTURES HOLDINGS, LLC, WORLDVENTURES
MARKETING, LLC, WORLDVENTURES MARKETING LIMITED,
WORLDVENTURES CANADA INC., WORLDVENTURES MARKETING
B.V., WORLDVENTURES MARKETING (HONG KONG) LIMITED,
WORLDVENTURES MARKETING PTE. LTD., WORLDVENTURES
TAIWAN LTD., WORLDVENTURES MARKETING PTY LTD.,
WORLDVENTURES MARKETING JAMAICA LIMITED,
WORLDVENTURES SERVICES, LLC, WORLDVENTURES
COOPERATIEF U.A., WORLDVENTURES MARKETING SP.Z.O.O,
WORLDVENTURES MARKETING SOUTH AFRICA, WORLDVENTURES
ENTERPRISES LLC, WV SERVICES MALAYSIA SDN BHD,

WORLDVENTURES MARKETING SRL, WORLDVENTURES MARKETING (CYPRUS) LIMITED, WORLDVENTURES MARKETING D.O.O. BEOGRAD, WORLDVENTURES MARKETING SL, D.O.O., WORLDVENTURES MARKETING LIMITED, WORLDVENTURES MARKETPLACE, LLC, WORLDVENTURES HOLDINGS (NETHERLANDS) B.V., WORLDVENTURES MARKETING LIMITED (NEW ZEALAND), WORLDVENTURES MARKETING COLOMBIA S.A.S., and WORLDVENTURES HOLDINGS ASIA PTE. LTD (hereinafter collectively referred to as "Plaintiffs" or "WorldVentures"), and in support of Plaintiffs' Emergency Application for Temporary Restraining Order, Plaintiffs provide the following Certification of Plaintiffs' counsel:

1. I have received no notice that Defendants are represented by legal counsel and no legal counsel has given notice to me or my clients of representation of the Defendants respect to the matters at issue in the Original Complaint.

2. I have reviewed Facebook comments and Facebook videos posted by Defendants on their Facebook accounts on June 3, 2018 announcing, promoting and soliciting for the launch of Defendants' new business named MAVIE. I have reviewed multiple comments being made by other Defendants to the announcements made on June 3, 2018.

3. In my professional opinion there is not time to give Defendants notice before the court considers Plaintiffs' Emergency Application for Temporary Restraining Order.

Dated: June 4, 2018.

Respectfully submitted,

By: /s/ Charles Bundren

**WM. CHARLES BUNDREN & ASSOCIATES
LAW GROUP, PLLC**

Wm. Charles Bundren, Esq.

Lead Attorney and Attorney-in Charge

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ATTORNEY FOR PLAINTIFFS:

WORLDVENTURES HOLDINGS, LLC

WORLDVENTURES MARKETING, LLC,

**WORLDVENTURES MARKETING
LIMITED,**

WORLDVENTURES CANADA INC.,

WORLDVENTURES MARKETING B.V.,

**WORLDVENTURES MARKETING (HONG
KONG) LIMITED,**

**WORLDVENTURES MARKETING PTE.
LTD.,**

WORLDVENTURES TAIWAN LTD.,

**WORLDVENTURES MARKETING PTY
LTD.,**

**WORLDVENTURES MARKETING
JAMAICA LIMITED**

WORLDVENTURES SERVICES, LLC,

**WORLDVENTURES COOPERATIEF U.A.,
WORLDVENTURES MARKETING SP.ZO.
O,
WORLDVENTURES MARKETING SOUTH
AFRICA,
WORLDVENTURES ENTERPRISES LLC,
WV SERVICES MALAYSIA SDN BHD,
WORLDVENTURES MARKETING SRL,
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S.A.S.
WORLDVENTURES HOLDINGS ASIA PTE. LTD**